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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
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In the Matter of	)	
	)	
Amendment of the Commission's Rules	)	
to Relocate the Digital Electronic Message	)	
Service From the 18 GHz Band to the	)	ET Dkt. No. 97-99
24 GHz Band and to Allocate the	)	
24 GHz Band for Fixed Service	)	
	)	

**JOINT MOTION TO EXCEED PAGE LIMITATION**

Digital Services Corporation ("DSC"), Microwave Services, Inc. ("MSI") and Teligent, L.L.C. ("Teligent," formerly Associated Communications L.L.C.) (collectively, the "DEMS Licensees"), by their attorneys, hereby submit this motion to exceed the 25-page limitation that normally governs oppositions to petitions for reconsideration of Commission orders. 47 C.F.R. § 1.429(f).

On March 14, 1997, the Commission adopted an order relocating the Digital Electronic Message Service ("DEMS") from the 18 GHz band to the 24 GHz band ("*DEMS Relocation Order*"). Four petitions for reconsideration and one petition for clarification of the *DEMS Relocation Order* were filed with the Commission on June 5, 1997.<sup>1</sup> The DEMS

<sup>1</sup> WebCel Communications, Inc., DIRECTV Enterprises, Inc. and BellSouth Corporation filed Petitions for Reconsideration; Millimeter Wave Carrier Association, Inc. filed a Petition for Partial Reconsideration; and WinStar Communications, Inc. filed a Petition for Clarification.

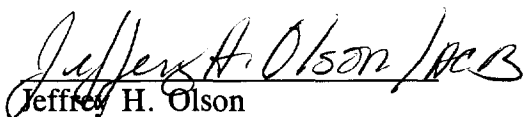
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Licensees, all of whom are incumbents being relocated to the 24 GHz band, are preparing a joint response to these petitions. Moreover, the DEMS Licensees intend to file a single opposition that responds to the five petitions for reconsideration or clarification, since many of the arguments raised in these petitions are similar and can be addressed in a consolidated filing. Consequently, the DEMS Licensees anticipate that they will need to exceed the 25-page limitation that applies to such oppositions.

In light of the complexity of the issues involved in the DEMS relocation proceeding and the importance of these issues to national security and the DEMS industry, it is in the public interest for the Commission to grant a waiver of the page limit. Specifically, the DEMS Licensees anticipate that in order to provide the Commission with a complete and accurate filing addressing the issues raised in the petitions for reconsideration or clarification, they will need to exceed the page limit. Further, the filing of one opposition will provide an efficient means for incumbent DEMS licensees with common interests to respond to the various petitions for reconsideration or clarification that have been filed in this proceeding. The Commission's grant of this motion would eliminate the need for duplicative pleadings, thereby reducing the burden on the DEMS Licensees and conserving valuable Commission resources.

For the foregoing reasons, DSC, MSI and Teligent respectfully request that the Commission grant this motion and allow them to exceed the 25-page limit on oppositions in this proceeding.

Respectfully submitted,



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Dated: June 26, 1997

### CERTIFICATE OF SERVICE

I, Carly Tolchin, hereby certify that on this 26th day of June, 1997, true and correct copies of the foregoing Joint Motion to Exceed Page Limitation filed by Digital Services Corporation, Microwave Services, Inc., and Teligent, L.L.C. were served by hand delivery or by Federal Express (\*) on the following parties:

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